

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
FEB 20 2020	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

NICHOLAS A. TRUTANICH
 United States Attorney
 District of Nevada
 Nevada Bar Number 13644
 ELHAM ROOHANI
 Assistant United States Attorney
 Nevada Bar Number 12080
 501 Las Vegas Blvd. South, Suite 1100
 Las Vegas, Nevada 89101
 Phone: (702) 388-6336
Elham.Roohani@usdoj.gov
Representing the United States of America

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANDRES RAFAEL VIOLA,

Defendant.

CRIMINAL INFORMATION

Case No:

VIOLATIONS:

COUNT I

Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a)

COUNT II

Possession of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B)

FORFEITURE ALLEGATIONS

Criminal Forfeiture, 18 U.S.C. § 2253

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

Sexual Exploitation of Children

Beginning on a date unknown, and continuing to on or about June 7, 2019, in the State and Federal District of Nevada,

ANDRES RAFAEL VIOLA,

1 defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "VICTIM
2 1", to engage in, any sexually explicit conduct for the purpose of producing any visual
3 depiction of such conduct, and that visual depiction was produced and transmitted using
4 materials that have been mailed, shipped, and transported in and affecting interstate and
5 foreign commerce by any means, including by computer, all in violation of Title 18, United
6 States Code, Sections 2251(a) and (e).

7 **COUNT TWO**

8 ***Possession of Child Pornography***

9 Beginning on a date unknown, and continuing to on or about June 7, 2019, in the
10 State and Federal District of Nevada,

11 **ANDRES RAFAEL VIOLA,**

12 defendant herein, did knowingly possess any book, magazine, periodical, film, videotape,
13 computer disk, and any other material that contains an image of child pornography, as
14 defined in Title 18, United States Code, Section 2256(8), that has been mailed, and shipped
15 and transported using any means and facility of interstate and foreign commerce and in and
16 affecting interstate and foreign commerce by any means, including by computer, and that was
17 produced using materials that have been mailed, and shipped and transported in and affecting
18 interstate and foreign commerce by any means, including by computer, all in violation of Title
19 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

20 **FORFEITURE ALLEGATION**

21 ***Sexual Exploitation of Children and Possession of Child Pornography***

22 1. The allegations contained in Counts One and Two of this Criminal Information
23 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
24 pursuant to 18 U.S.C. § 2253(a)(1), 2253(a)(2), and 2253(a)(3).

2. Upon conviction of any of the felony offenses charged in Counts One and Two of this Criminal Information,

ANDRES RAFAEL VIOLA,

defendant herein, shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. §§ 2251 and 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of 18 U.S.C. §§ 2251(a) and 2252A(a)(5)(B):

defendant herein, shall forfeit to the United States of America, any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from violations of 18 U.S.C. §§ 2251(a) and 2252A(a)(5)(B):

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to promote the commission of 18 U.S.C. §§ 2251(a) and 2252A(a)(5)(B) or any property traceable to such property:

(1) Samsung Chromebook, Model XE500C12, S/N OGX591LG506256T;

(2) Samsung Galaxy S9 Plus 128 GB, Model SM-G965U, S/N R38K60KDFAP,
IMEI 354649091346938;

(3) Dell Latitude Laptop, Model 7480, S/N 3XYX9H2; and

(4) SanDisk 512 SSD Mini SATA Card, Model X400M, S/N 171101421467.

//

//

//

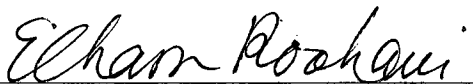
//

//

1 All pursuant to 18 U.S.C. §§ 2251(a), 2252A(a)(5)(B), 2253(a)(1), 2253(a)(2), and
2 2253(a)(3).

3 DATED: this 20 day of ~~January~~^{Feb.}, 2020.

4
5 NICHOLAS A. TRUTANICH
United States Attorney

6 
7 ELHAM ROOHANI
8 Assistant United States Attorney
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24